



# MEMO ENDORSED

July 28, 2021

**Via ECF**

Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007

USDC SDNY  
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**Re: *Safe Passage Project v. U.S. Customs and Border Protection, et al.*, 1:21-cv-03288-VEC**  
**Joint Request for Adjournment of Initial Pretrial Conference**

Dear Judge Caproni:

On behalf of the parties, Plaintiff writes to respectfully request that the Court adjourn the initial pretrial conference in the above referenced matter, currently scheduled for August 6, 2021 at 10:00 am by teleconference, and the filing of the joint letter, currently due on July 29, 2021, for three weeks. This is the parties' third request for an adjournment of the initial pre-trial conference.

Parties request that the conference is adjourned to permit the parties to seek to resolve claims raised in this action, brought under the Freedom of Information Act (FOIA). *See* ECF No. 1 at 7. Defendant U.S. Customs and Border Protection made its final production of records on July 26, 2021. Following Plaintiff's review of the records produced, the parties intend to confer regarding next steps, including whether the case may be resolved without further intervention by this Court, within the next week.

Parties request that the conference is adjourned for three weeks and propose that the conference is re-scheduled for August 27, 2021.

Respectfully submitted,

s/ Kristin Macleod-Ball

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cc: Rebecca Friedman, Counsel for Defendants

Application GRANTED. The initial pretrial conference is adjourned to **August 27, 2021 at 10:00 a.m.** The parties must appear for the conference by dialing 888-363-4749, using the access code 3121171 and the security code 3288. The parties' joint submission is due by **August 19, 2021**.

SO ORDERED.



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

7/28/2021